

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

MICHAEL KULAKOWSKI,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO.
)	3:16-CV-02510
)	
WESTROCK SERVICES, INC.,)	
)	
Defendant.)	

DEPOSITION OF
TRACIE MICHELLE DUNCAN
Taken on Behalf of the Plaintiff
November 16, 2017
Commencing at 1:40 p.m.

Reported by: Jerri L. Porter, RPR, CRR
Tennessee LCR No. 335
Expires: 6/30/2018

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1 being there, of course, and he was venting, kind of.

2 Q What was he venting about?

3 A About Mary coming and Terry talking to them.

4 Q Terry talking to him? Which Terry?

5 A Terry Stafford.

6 Q Did he talk to you about this case?

7 A He just made a comment that he was a lying
8 motherfucker. Sorry.

9 MS. COLLINS: That who was lying?

10 THE WITNESS: Terry Stafford.

11 MS. COLLINS: Okay.

12 BY MR. SUAREZ:

13 Q Is this within the last month or so?

14 A I want to say, yeah, month,
15 month-and-a-half.

16 MR. SUAREZ: Can I have one moment to
17 talk to my colleague.

18 (Discussion off the record.)

19 MR. SUAREZ: That's all I have.

20 FURTHER DEPONENT SAITH NOT.

21 (Proceedings concluded at 2:00 p.m.)

22

23

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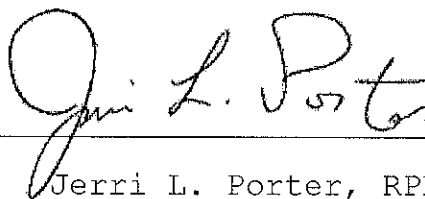
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REPORTER'S CERTIFICATE

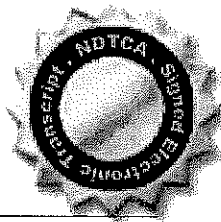
I, Jerri L. Porter, RPR, CRR, Notary Public and Court Reporter, do hereby certify that I recorded to the best of my skill and ability by machine shorthand all the proceedings in the foregoing transcript, and that said transcript is a true, accurate, and complete transcript to the best of my ability.

I further certify that I am not an attorney or counsel of any of the parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

SIGNED this 28th day of November, 2017.



Jerri L. Porter, RPR, CRR



My Notary commission expires: 2/19/2018

Tennessee LCR No. 335
Expires: 6/30/2018